

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Suits Against the Saint Thomas Entities

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

**SAINT THOMAS ENTITIES' NOTICE OF FILING OF
DEPOSITION NOTICES TO BELLWETHER CANDIDATE PLAINTIFFS**

The Saint Thomas Entities,¹ pursuant to Federal Rule of Civil Procedure 30, come now and give notice to the Court and to all parties of the issuance and filing of the following:

1. Second Amended Notice of Taking Videotaped Deposition Duces Tecum to Bellwether Candidate Plaintiff Denis Brock and Plaintiff Jerry Brandt Brock²
2. Notice of Taking Videotaped Depositions Duces Tecum to Bellwether Candidate Plaintiff Adam Ziegler and Plaintiff Sarah Ziegler³
3. Notice of Taking Videotaped Depositions Duces Tecum to Bellwether Candidate Plaintiff Phillip Tyree and Plaintiff Maria Tyree⁴

¹ Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

2 Ex. 1.

3 Ex. 1.
Ex. 2.

4 Ex. 3.

Dated: November 30, 2015

SAINT THOMAS HEALTH, SAINT
THOMAS NETWORK, and SAINT
THOMAS WEST HOSPITAL

By their attorneys,

/s/ Sarah P. Kelly
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CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 30th day of November, 2015.

/s/ Sarah Kelly

Sarah P. Kelly

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